

Message

From: Theresa Pugh [Pugh@theresapughconsulting.com]
Sent: 12/20/2018 4:25:26 PM
To: Wehrum, Bill [Wehrum.Bill@epa.gov]; Culligan, Kevin [Culligan.Kevin@epa.gov]; Woods, Clint [woods.clint@epa.gov]; Swanson, Nicholas [Swanson.Nicholas@epa.gov]
CC: Hambrick, Amy [Hambrick.Amy@epa.gov]
Subject: OOOO(a) Comments: Methane and cross walk issues to ACE
Attachments: attachment 1.pdf; ATT00001.txt

Good morning.

These comments were filed this week on methane [OOOO(a)] NSPS for oil and gas. These comments primarily focus on fugitive methane leaks from natural gas pipelines and compressor stations- serving electric power.

There is a connection between the ACE regulation and OOOO(a) on natural gas because, as we are learning, there is a significant relationship between the two industries. Just look at the pipeline explosions over the last 6 months. Two of them caused gas curtailments for the power sector- even if for only a day or two.

A few of my opinions and recommendations might surprise you. My goal is to make certain the electric utilities remain reliable- regardless of fuel supply while co2 and methane are regulated. I am sure you want that too.

My ACE comments addressed some of the cross cutting issues with methane leaks but not in this level of detail as expressed in attached OOOOa comments.

Have an enjoyable holiday. I hope you all get some well deserved time off.